

Michael Lazarus, Esq. – I.D. Number 032211982  
 DUGHI, HEWIT & DOMALEWSKI  
 340 North Avenue  
 Cranford, New Jersey 07106  
 (908) 272-0200  
 Attorneys for Defendant, Balmatee Naidoo, RN

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEW JERSEY**

ELIZABETH MCNAIR, ADMINISTRATOR :  
 AD PROSEQUENDUM OF THE ESTATE :  
 OF DARRELL SMITH, AND ELIZABETH : Civil Action No.: 2:21-cv-01291  
 MCNAIR, INDIVIDUALLY, :

Plaintiff,

vs.

**NOTICE OF APPEARANCE**

STATE OF NEW JERSEY, DEPARTMENT :  
 OF CORRECTIONS, SPECIAL :  
 TREATMENT UNIT, ADULT :  
 DIAGNOSTIC & TREATMENT CENTER, :  
 COMMISSIONER MARCUS O. HICKS, in :  
 his official and individual capacity, :  
 RAYMOND ROYCE, in his official and :  
 individual capacity, NEW JERSEY :  
 DEPARTMENT OF HEALTH, RUTGERS, :  
 THE STATE UNIVERSITY OF NEW :  
 JERSEY, d/b/a RUTGERS BIOMEDICAL & :  
 HEALTH SCIENCES, UNIVERSITY :  
 CORRECTIONAL HEALTH CARE, :  
 CHARICE POWELL, in her official and :  
 individual capacity, GIUSEPPE MANDARA, :  
 in his official and individual capacity, HENRY :  
 ACEBO, in his official and individual :  
 capacity, OFFICER JAGDAT PERSAD, in his :  
 official and individual capacity, OFFICER :  
 MARZETTE SHAMBERGER, in his official :  
 and individual capacity, SGT. FREDDIE :  
 RODRIGUEZ, in his official and individual :  
 capacity, OFFICER JOSE VALENTIN, in his :  
 official and individual capacity, OFFICER :  
 DAMION GILBERT, in his official and :  
 individual capacity, OFFICER RONY :  
 APONTE, in his official and individual :

capacity, OFFICER TIMOTHY FOSTER, in :  
his official and individual capacity, OFFICER :  
BENNY PEREZ, in his official and individual :  
capacity, SGT. TIMMIE ORANGE, in his :  
official and individual capacity, SGT. PHILIP :  
RILEY, in his official and individual capacity, :  
LT. ANTONIO COSTEIRO, in his official :  
and individual capacity, LT. FRANCISCO :  
ESTRADA, in his official and individual :  
capacity, ARTHUR BREWER, M.D., CCHO, :  
in his official and individual capacity, FRANK :  
A. GHINASSI, PHD, in his official and :  
individual capacity, JULIE WHITE, MSW, :  
CCHP, in her official and individual capacity, :  
IHUOMA NWACHUKWU, M.D., in her :  
official and individual capacity, :  
BHARATKUMAR R. PATEL, M.D., in his :  
official and individual capacity, BENEDICTA :  
KONAMAH, RN, in her official and :  
individual capacity, BALMATEE NAIDOO, :  
RN; in her official and individual capacity, :  
YVONNE P. PADEN, RN; in her official and :  
individual capacity, MARIE COLTILDE :  
FLEURANTIN, RN, in her official and :  
individual capacity, DELORES GUIDA, RN; :  
in her official and individual capacity, JOHN :  
DOES 1-20, JANE ROES 1-20, in their :  
official and individual capacity, and ABC :  
COMPANY/CORPORATION, 1-10) :  
(fictitious names), :

Defendants. :

TO: THE CLERK OF THE COURT AND ALL PARTIES OF RECORD

I am admitted or otherwise authorized to practice in this Court, and I appear in this case as counsel for Defendant, Balmatee Naidoo, RN in the above-referenced matter.

**Dughi, Hewit & Domalewski**

Attorneys for Defendant, Balmatee Naidoo, RN

*/s/ Michael Lazarus*

By: \_\_\_\_\_  
Michael Lazarus, Esq.

Dated: October 20, 2022

G:\17752\WORD.DOC-DRAFTS\McNair-17752-2022-10-20-PLD (Notice of Appearance)-COURT-MLL.docx